

1 the aforementioned Live Nation contract.

2 10. Ms. Blige has cut me off financially, with the exception of the two (2) spousal  
3 support payments she made to me in August and September 2016 and the single \$25,000  
4 contribution she made to my attorney's fees and costs in August 2016. I note that the \$35,000 and  
5 \$50,000 payments Ms. Blige made to me in August and September 2016 are aggregately *less* than  
6 what the monthly amount for guideline support should be for a single month.

7 11. Ms. Blige and I own and operate various corporations and LLCs, including but not  
8 limited to Mary Jane Productions, Inc., Matriarch Entertainment, Inc., MJB Management, Inc.,  
9 MJB Merchandising, Inc., MJB Records, Inc., KI Productions, Inc. Ms. Blige has blocked my  
10 access to any and all bank accounts we held together, including the business accounts associated  
11 with the aforementioned companies. Currently, I have one checking account in my name. That  
12 account has nominal funds in it.

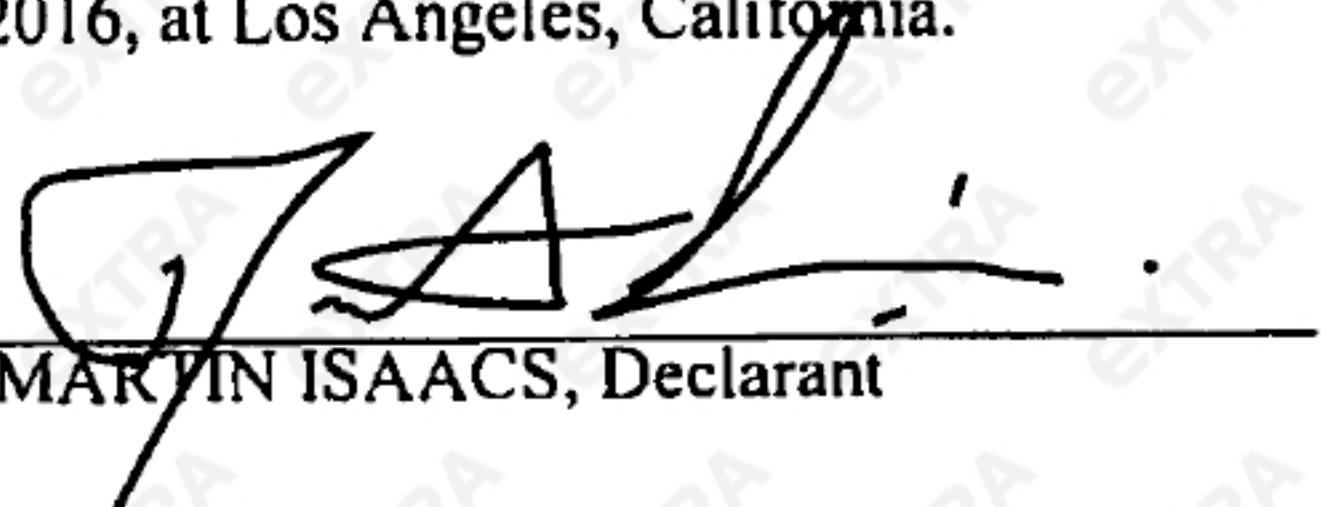
13 12. The professional success Ms. Blige experienced during our marriage enabled us to  
14 live a very lavish and luxurious lifestyle. Our estimated expenses are reflected in my concurrently  
15 filed Income and Expense Declaration.

16 13. I, therefore, need spousal support so that I can continue to live in the same manner  
17 that I have been accustomed to during our 10+ year marriage.

18 14. Based on the foregoing, I request that the Court award me *pendente lite* spousal  
19 support in an amount no less than \$129,319 per month, \$100,000 toward my attorneys fees and  
20 costs, and \$30,000 toward my forensic accounting fees.

21 I declare under the penalty of perjury under the laws of the State of California that the  
22 foregoing is true and correct.

23 Executed this 6<sup>th</sup> day of October, 2016, at Los Angeles, California.

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26 MARTIN ISAACS, Declarant  
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**DECLARATION OF ROBERT C. BRANDT**

I, ROBERT C. BRANDT, declare as follows:

1. I am an attorney at law and Certified Family Law Specialist duly licensed to practice before all courts in the State of California. I am a partner in the law firm of Feinberg, Mindel, Brandt & Klein, LLP ("FMBK") and we are currently counsel of record for Respondent, MARTIN ISAACS (hereinafter "Mr. Isaacs"). I have personal knowledge of the facts stated herein, and if called upon to testify, I could and would competently testify thereto, except as to those matters that may be stated on information and belief, and as to those matters, I believe the same to be true.

2. This Declaration is prepared and submitted in lieu of personal testimony pursuant to Code of Civil Procedure §§ 2009 and 2015.5, California Rules of Court, Rule 5.118(f), and Reifler v. Superior Court (1974) 39 Cal.App.3d 479, 114 Cal.Rptr. 356.

3. I submit this declaration in support of Mr. Isaacs's Request for Order (hereinafter "RFO") for the following relief:

- a. *Pendente lite* spousal support in an amount no less than \$129,319;
- b. Attorney's fees and costs payable by Petitioner, Mary Jane Blige, in the sum of \$100,000; and
- c. Forensic Accountant Fees and Costs payable by Petitioner, Mary Jane Blige, in the sum of \$30,000.

**CALCULATION OF PENDENTE LITE SPOUSAL SUPPORT**

4. Mr. Isaacs's request for *pendente lite* spousal support in the sum of no less than \$129,319 is based on the Dissomaster Reports and cash flow analysis prepared by Mr. Isaacs's forensic accountant, Irwin Nachimson of Nigro, Karlin, Segal, Feldstein and Bolno. The declaration of Mr. Nachimson with the accompanying Dissomaster Reports and cash flow analysis is filed concurrently herewith.

5. As stated in the concurrently filed declaration of Martin Isaacs, as per the parties'



1 Stipulation Re: Advance of Spousal Support; Retroactivity; Order Thereon, any award of  
2 spousal support to Mr. Isaacs must be made retroactive to September 1, 2016. (See **Exhibit**  
3 **"1"**).

4 6. My office has been cooperative and willing to execute a Confidentiality  
5 Agreement as proposed by Ms. Blige's attorneys. On or about September 7, 2016, Mr. Isaacs  
6 and I executed a Stipulated Protective Order re: Confidential Information; And Order Thereon  
7 (hereinafter "Stipulated Protective Order"), which was subsequently filed with the Court. On or  
8 about October 5, 2016, I was notified by Ms. Blige's counsel, Gary Fishbein, that the Stipulated  
9 Protective Order had been rejected by the Court for failure to comply with the Local Rules of  
10 Court. Notwithstanding the fact that the Court has not signed the Stipulated Protective Order, I  
11 have not attached to this instant RFO financial documents that may have been deemed to be  
12 confidential in nature by either party. Upon request, I will bring to the hearing the financial  
13 documents referenced in this RFO.

14 **MY QUALIFICATIONS AND THE QUALIFICATIONS OF MY FIRM**

15 7. In order to provide the Court with background information concerning Mr.  
16 Isaacs's request for attorney's fees and costs, I offer the Court the following information:

- 17 a. I have an "AV" rating from Martindale Hubbell, Inc.;
- 18 b. I am certified as a Specialist in Family Law by the State Bar of California, Board  
19 of Legal Specialization;
- 20 c. I was admitted to the California State Bar in 1977;
- 21 d. I am a Fellow in the American Academy of Matrimonial Lawyers (AAML) and  
22 International Academy of Matrimonial Lawyers; I currently serve as President for  
23 the Southern California Chapter of the AAML. Previously, I was Treasurer for  
24 four (4) years and Vice President;
- 25 e. I am a Past Chair of the Los Angeles County Bar Association Family Law  
26 Section and have held every officer position available in the Section since being  
27 appointed to the Family Law Executive Committee in 2003;
- 28 f. I am currently a member of the Beverly Hills Bar Association Family Law

Executive Committee;

- g. I have been a lecturer and/or Moderator over the last twenty (20) years on approximately twenty (20) occasions through the Los Angeles County Bar Association, Family Law Section, Continuing Legal Education Committees ("CLE"), Los Angeles County Family Law Symposium, Association of Certified Family Law Specialist, Beverly Hills Bar Association, Iranian and American Lawyers Association Cultural Competency Seminars, and at various family law study groups all with respect to various Family Law topics;
- h. I co-authored an article on undue influence published in the September, 2008 edition of Los Angeles Lawyer Magazine; I co-authored the Chapter of Family Law/Domestic Relations in the 2009 edition of the Thompson-West 4 Volume Treatise on the Law of Professional and Amateur Sports;
- i. I have served as Minor's Counsel in several child custody cases;
- j. I have served as an Arbitrator in fee disputes, including Family Law fee disputes, between attorneys and clients through the Los Angeles County Bar Association;
- k. I was a mediator in the Family Law Mediation Program for the Los Angeles Superior Court including downtown and the branch courts for over 20 years and am a volunteer mediator for the VAST project;
- l. I have served as a grader for the State Bar of California, Board of Legal Specialization with respect to the Family Law Certification Examination;
- m. I am a member of the Family Law Sections of the State Bar of California and the Los Angeles County Bar Association; and
- n. I am a member of the Association of Certified Family Law Specialists.

#### **REPRESENTATION OF MR. ISAACS**

8. My office was retained by Mr. Isaacs on or about August 23, 2016. My hourly rate is \$775. I have been and will continue to be assisted by Lucy Vartanian, Esq. Ms. Vartanian was admitted to the California State Bar in 2013 and has exclusively devoted her practice to family law. Ms. Vartanian is a graduate of Southwestern Law School and completed



1 her undergraduate studies at University of California, San Diego. Presently, Ms. Vartanian is an  
2 active member of the Los Angeles County Bar Association, Southern California Family Law Inn  
3 of Court, Armenian Bar Association and the Southwestern Alumni Nickel Club. Ms. Vartanian  
4 is currently billed at an hourly rate of \$275.

5 9. Other associates in my office are billed at an hourly rate of \$195 to \$425, and  
6 paralegals are billed at an hourly rate of \$175 to \$225 per hour. All of the services that have  
7 been rendered to Mr. Isaacs in my office have been billed at the foregoing rates, or were in  
8 certain instances reduced as a courtesy.

9 10. Below is a breakdown of the work that has transpired between August 23, 2016  
10 and the present:

- 11 a. Preparation of Mr. Isaacs's Response to Petition for Dissolution of Marriage;
- 12 b. Drafting and propounding of written discovery, including Form Interrogatories,  
13 Family Law, Set No. One and Request for Production of Documents, Set No.  
14 One;
- 15 c. Review of financial documents informally produced by Ms. Blige's attorney,  
16 including but not limited to Individual Income Tax Returns;
- 17 d. Preliminary Review of Premarital Agreement executed by the parties;
- 18 e. Review and negotiations regarding Stipulated Protective Order re:  
19 Confidentiality prepared by Ms. Blige's attorney;
- 20 f. Negotiation and preparation of Stipulation Re Advance of Spousal Support,  
21 Retroactivity; Order Thereon;
- 22 g. Negotiation and preparation of Stipulation Re Loan Modification pertaining to  
23 jointly owned real property;
- 24 h. Extensive letters, email correspondence, and telephone calls with Ms. Blige's  
25 attorney, Gary Fishbein, Esq.;
- 26 i. Extensive letters, email correspondence, and telephone calls with Mr. Isaacs;
- 27 j. Extensive letters, email correspondence, and telephone calls with the forensic  
28 accounting firm of Nigro, Karlin, Segal, Feldstein and Bolno; and

- 1 k. Preparation of the instant Request for Orders;
- 2 l. Preparation of Opposition to Ms. Blige's *Ex Parte* Application of October 7,
- 3 2016 regarding a request to stay discovery; and
- 4 m. Preparation of *Ex Parte* Application to continue Ms. Blige's Request for Order
- 5 re: Request for Separate Trial and Stay of Discovery of Certain Issues Pending
- 6 the Separate Trial, set for hearing on November 9, 2016.
- 7 11. I anticipate no less than the following professional services will need to be
- 8 performed in this case:
- 9 a. Preparation of and attendance at the hearing on the instant Request for Orders;
- 10 b. Preparation of and attendance at hearings for future Request for Orders, including
- 11 the Request for Orders filed by Ms. Blige in connection with a request for a
- 12 separate trial on the issue of the premarital agreement;
- 13 c. Review responses to discovery propounded;
- 14 d. Oral deposition of Petitioner and potential third parties;
- 15 e. Propound discovery in the form of subpoenas and/or take the live deposition of
- 16 third party witnesses;
- 17 f. Preparation for bifurcated trial regarding the validity of the parties' premarital
- 18 agreement; and
- 19 g. Prepare for a settlement mediation, including but not limited to preparation of
- 20 mediation brief.
- 21 12. I anticipate that Mr. Isaacs will incur significant legal fees as a result of the
- 22 parties' premarital agreement, which, as more specifically set forth in the declaration of Martin
- 23 Isaacs, was executed two (2) days prior to the parties' wedding in New York while Mr. Isaacs
- 24 was not represented by counsel. The premarital agreement contains a spousal support waiver.
- 25 13. On or about September 23, 2016, Ms. Blige's attorney filed a Request for Orders
- 26 re: Request for Separate Trial and Stay of Discovery of Certain Issues Pending the Separate
- 27 Trial. The bifurcated trial will require many hours of extensive legal research and preparation to
- 28 the extent that the premarital agreement is governed by New York law. Mr. Isaacs may need to



1 retain the services of legal counsel in New York to adequately challenge the validity of the  
2 premarital agreement.

3 14. I estimate that the legal services to be incurred by Mr. Isaacs through complete  
4 resolution of all outstanding issues will exceed 150 hours. Based on my assessment, a request  
5 of attorney's fees and costs in an amount no less than \$100,000 is reasonable and we will  
6 therefore reserve Mr. Isaacs's right to make a future request, should it become necessary.

7 15. Since August 23, 2016, Mr. Isaacs has incurred approximately \$14,596 in  
8 attorney's fees and costs with my firm. My billing cycle cut-off is the tenth (10<sup>th</sup>) of each  
9 month. The \$14,596 reflects fees incurred through September 9, 2016. Since September 10,  
10 2016, I estimate that Mr. Isaacs has incurred more than \$15,000 in attorney's fees. My Firm  
11 requires a \$25,000 replenishment payment. After my next billing cycle concludes on October 9,  
12 2016, Mr. Isaacs will have an outstanding balance with my firm.

13 16. Without waiving the attorney-client privilege or work product rule, attached  
14 hereto as **Exhibit "2"** is a true and correct copy of the redacted fee invoice generated on Mr.  
15 Isaacs's behalf for the time period August 23, 2016 through September 9, 2016.

16 17. Based upon my observations in this matter as well as my litigation and family  
17 law experience, Mr. Isaacs currently seeks an award of attorney's fees and costs an amount no  
18 less than \$100,000, and Mr. Isaacs reserves the right to seek further fee awards depending on  
19 developments that may arise.

20 18. It is my professional and good faith opinion that an Order requiring Ms. Blige to  
21 pay Mr. Isaacs's aforementioned attorney's fees is reasonable, necessary and appropriate,  
22 pursuant to Family Code section 2030, et seq., in view of the parties' respective abilities to pay,  
23 and after a consideration of the parties' respective incomes and needs in order to ensure that  
24 each party has equal access to legal representation to preserve their rights and interests.

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1 19. It is my professional and good faith opinion that all of the foregoing services,  
2 attorney's fees and costs were, are and will be reasonably necessary for the representation of Mr.  
3 Isaacs in this action.

4 I declare under penalty of perjury, under the laws of the state of California, that the  
5 foregoing is true and correct.

6 Executed on October 6, 2016 at Los Angeles, California.

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8 ROBERT C. BRANDT, ESQ., Declarant  
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